

EXHIBIT B

BEFORE THE COURT OF
GEARY COUNTY
STATE OF KANSAS

INQUISITION - SUBPOENA DUCUS TECUM

In the matter of an investigation conducted pursuant to K.S.A. 22-3101, by the Geary County Attorney, or his designee, having knowledge regarding a Drug Proceeds investigation.

STATE OF KANSAS, GEARY COUNTY, SS:

THE STATE OF KANSAS TO: Prima Federal Credit Union

You are hereby commanded to produce before Tony Cruz, Assistant Geary County Attorney, the following records in your care, custody or control, by providing originals or authenticated copies to Officer Nicholas Blake, with the Junction City Police Department, 210 East Ninth Street, Junction City, Kansas 66441. 785-762-5912 nicholas.blake@jcks.com

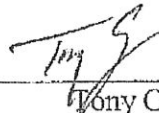
These records consist of:

Any and all records associated with accounts for Marshall Herbert Dion (DOB [REDACTED]/1935) SSN: [REDACTED]-8045 for the periods between January 1st 2010 through June 18th 2013.

Prima Federal Credit Union and all of its employees shall not disclose the existence of the investigation to the listed or requested customers or any other person(s) unless or until otherwise ordered by the court.

Whereof fail not, under penalty of the law.

In witness whereof, I have hereunto set my hand, at my office in Junction City, in said county, this 20th day of June, 2013.



Tony Cruz
Assistant Geary County Attorney

Return of Service

Nicholas Blake, being Duly sworn according to law, on his oath deposes and says that on this 21st day of June, 20 13, at 1:04 o'clock P.M., served the party named above with the Subpoena Daces Tecum, a true copy thereof.

Signature

Al All 38 Blake

BEFORE THE COURT OF
GEARY COUNTY
STATE OF KANSAS

INQUISITION - SUBPOENA DUCUS TECUM

In the matter of an investigation conducted pursuant to K.S.A. 22-3101, by the Geary County Attorney, or his designee, having knowledge regarding a Drug Proceeds investigation.

STATE OF KANSAS, GEARY COUNTY, SS:

THE STATE OF KANSAS TO: Citizens Bank

You are hereby commanded to produce before Tony Cruz, Assistant Geary County Attorney, the following records in your care, custody or control, by providing originals or authenticated copies to Officer Nicholas Blake, with the Junction City Police Department, 210 East Ninth Street, Junction City, Kansas 66441. 785-762-5912 nicholas.blake@jcks.com


These records consist of:

Any and all records associated with accounts for Marshall Herbert Dion (DOB [REDACTED]/1935) SSN: [REDACTED] 8045 including records associated with account numbers [REDACTED] 5336, [REDACTED] 164, and any other accounts not listed here for the periods between January 1st 2010 through June 18th 2013.

Citizens Bank and all of its employees shall not disclose the existence of the investigation to the listed or requested customers or any other person(s) unless or until otherwise ordered by the court.

Whereof fail not, under penalty of the law.

In witness whereof, I have hereunto set my hand, at my office in Junction City, in said county, this 20th day of June, 2013.



Tony Cruz
Assistant Geary County Attorney

Return of Service

Nicholas Blake, being Duly sworn according to law, on his oath deposes and says that on this 20th day of June, 20 13, at 1:10 o'clock P.M., served the party named above with the Subpoena Daces Tecum, a true copy thereof.

Signature AO All 38

BEFORE THE COURT OF
GEARY COUNTY
STATE OF KANSAS

INQUISITION - SUBPOENA DUCUS TECUM

In the matter of an investigation conducted pursuant to K.S.A. 22-3101, by the Geary County Attorney, or his designee, having knowledge regarding a Drug Proceeds investigation.

STATE OF KANSAS, GEARY COUNTY, SS:

THE STATE OF KANSAS TO: Sovereign Bank

You are hereby commanded to produce before Tony Cruz, Assistant Geary County Attorney, the following records in your care, custody or control, by providing originals or authenticated copies to Officer Nicholas Blake, with the Junction City Police Department, 210 East Ninth Street, Junction City, Kansas 66441. 785-762-5912 nicholas.blake@jcks.com

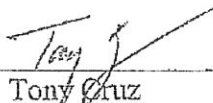
These records consist of:

Any and all records associated with accounts for Marshall Herbert Dion (DOB [REDACTED] 1935) SSN: [REDACTED] 8045 including records associated with Bank of America Visa Card number [REDACTED] 6342, and account number [REDACTED] 6743, and any other accounts not listed here for the periods between January 1st 2010 through June 18th 2013.

Sovereign Bank and all of its employees shall not disclose the existence of the investigation to the listed or requested customers or any other person(s) unless or until otherwise ordered by the court.

Whereof fail not, under penalty of the law.

In witness whereof, I have hereunto set my hand, at my office in Junction City, in said county, this 20th day of June, 2013.


Tony Cruz

Assistant Geary County Attorney

Return of Service

Nicholas Blake, being Duly sworn according to law, on his oath deposes and says that on this 20th day of June, 20 13, at 1:00 o'clock P.M., served the party named above with the Subpoena Daces Tecum, a true copy thereof.

Signature AL All 38 Blake

BEFORE THE COURT OF
GEARY COUNTY
STATE OF KANSAS

INQUISITION - SUBPOENA DUCUS TECUM

In the matter of an investigation conducted pursuant to K.S.A. 22-3101, by the Geary County Attorney, or his designee, having knowledge regarding a Drug Proceeds investigation.

STATE OF KANSAS, GEARY COUNTY, SS:

THE STATE OF KANSAS TO: Bank of America

You are hereby commanded to produce before Tony Cruz, Assistant Geary County Attorney, the following records in your care, custody or control, by providing originals or authenticated copies to Officer Nicholas Blake, with the Junction City Police Department, 210 East Ninth Street, Junction City, Kansas 66441. 785-762-5912 nicholas.blake@jcks.com

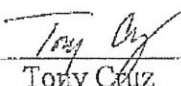
These records consist of:

Any and all records associated with accounts for Marshall Herbert Dion (DOB [REDACTED] 1935) SSN: [REDACTED]-8045 including records associated with Bank of America Visa Card numbers [REDACTED] 1874 and [REDACTED] 2301, and account numbers [REDACTED] 3213 and [REDACTED] 1455, and any other accounts not listed here for the periods between January 1st 2010 through June 18th 2013.

Bank of America and all of its employees shall not disclose the existence of the investigation to the listed or requested customers or any other person(s) unless or until otherwise ordered by the court.

Whereof fail not, under penalty of the law.

In witness whereof, I have hereunto set my hand, at my office in Junction City, in said county, this 20th day of June, 2013.


Tony Cruz
Assistant Geary County Attorney

Return of Service

Nicholas Blake, being Duly sworn according to law, on his oath deposes and says that on this 20th day of June, 20 13, at 1:00 o'clock P.M., served the party named above with the Subpoena Daces Tecum, a true copy thereof.

Signature ALD All 38

STATE OF KANSAS)

COUNTY OF GEARY)

AFFIDAVIT

COMES NOW K-9 Officer Nicholas Blake, Junction City Police Officer, being of lawful age and first duly sworn, a Police Officer with the Junction City Police Department, to advise the court of the following information in a criminal investigation in Junction City, Geary County, Kansas:

On 06/18/13, at approximately 0933 hours, the Affiant (Also known as I) was on patrol traveling East on Interstate 70, at mile marker 292, Junction City, Geary County, Kansas. This area is a four lane highway with a set of lanes for each direction of travel. The set of lanes is divided by a grassy ditch area (Median). I note that in addition to being a sworn Officer for the City of Junction City, I am also a sworn Deputy for the Geary County Sheriff's Department and I am authorized to enforce laws within all of Geary County, Kansas. The weather was clear, warm, and sunny with a temperature of approximately 80 degrees Fahrenheit. I was operating marked patrol unit 216 which is equipped with Stalker radar, a camera system, and lights and sirens. I observed a gray/silver pickup truck pass by me at what appeared to be an accelerated speed. The truck was traveling West and I checked the truck's speed using my Stalker Radar system, which I am certified to use. I checked the trucks speed at 79 MPH in a posted 75 MPH zone. As I observed the truck's speed, it increased to 80 MPH. I turned around and caught up to the vehicle. I then conducted a traffic stop on the same truck on Interstate 70, at mile marker 289, Westbound. I note the final stop location was just inside Dickinson County, Kansas.

The truck was a 2002 GMC Sierra that had Colorado registration number 751 ARU. I made a passenger side approach and I made contact with the driver (Only occupant). The driver identified himself as Marshall Herbert Dion with an Arizona license. I noticed the address on the license showed a PO Box in Tucson, Arizona. I explained the reason for the stop and Marshall replied that he was "following traffic." I asked Marshall for his vehicle documents, which he provided. While Marshall gathered his documents, I questioned him about his travel. Marshall said he had a residence in Arizona and Massachusetts. Marshall said that he was coming from Pennsylvania and going back to Arizona. I asked Marshall to come sit in my patrol car with me while I checked his license and that I would only issue him a warning citation for the traffic violation. Marshall was apologetic for the minor traffic violation he had committed.

As Marshall exited his truck, I asked him if he had any knives or weapons on his person. Marshall said he did not and added that he was 78 years old and that I could look in his truck if I wanted to. I found this behavior a little odd as the majority of people I come in contact with regarding minor traffic violations don't just offer to let me look inside their vehicle. Marshall and I got into my patrol vehicle 3 minutes and 5 seconds into the stop. Once inside my patrol vehicle, I further spoke with Marshall about his employment, his travel plans, etc. Marshall told me the following:

- He was retired from the tobacco industry
- He was invested in real estate and he does not worry about money

- He collects social security and a pension
- He was coming from Yardley, Pennsylvania
- He went there to see his Certified Public Accountant (CPA)
- The purpose of his trip to Pennsylvania was to get caught up on "Some stuff"
- In addition to getting caught up on some stuff, he visited two museums
- He started his trip to Pennsylvania in Tucson, Arizona
- He left Tucson two weeks prior
- He was not going back to Tucson
- There were CPA's in Tucson
- He goes to see Pennsylvania CPA because he has been with her for a long time and she "Gives him a break" on the charges
- He was in Pennsylvania for three days
- He slept at his CPA's house while he was in Pennsylvania
- He was not intimately involved with
- His truck had Colorado plates because he owns property in Colorado
- He used to live in Colorado
- He trains Pilots
- He had been arrested before for "All kinds of things"
- Then says he has been arrested for possession of marijuana and "That's about it"
- That arrest was 18-20 years prior
- He owns property in Arizona, Massachusetts, and Colorado
- He rents out these properties
- He is not involved in drugs
- He is going to "hang out" when he gets back to Tucson
- He is going to do some work to his house as he just had a new water heater and his irrigation system is "all screwed up."

While talking with Marshall he seemed very nervous about something even though I had already told him I planned on only issuing him a warning citation and then getting him on his way. I could see Marshall's pulse pounding in his stomach area and I could also see the same in his carotid artery. Marshall seemed so nervous that I asked him if he heard me say that I was only going to issue him a warning citation. Marshall acknowledged that he had heard me previously.

I note that I ran Marshall's information through Dispatch 9 minutes and 34 seconds into the stop. Dispatch came back with the returns 16 minutes and 40 seconds into the stop. Dispatch advised that Marshall had a valid license and he was not wanted. Dispatch further advised that Marshall's arrest history was quite extensive and it involved several arrests for distribution of marijuana and cocaine. I note that I also ran a check on Marshall through the El Paso Intelligence Center (EPIC).

I found several things that were odd about Marshall's trip and some of his responses to my questions. The following is what I found:

- Google maps showed the most likely route from Boston to Tucson would be West on Interstate 70 then down on Interstate 44 in Missouri and Oklahoma and then on Interstate 40 to Arizona.
- His trip did not make much sense that he would drive 2345 miles one way to get caught up on some stuff with his CPA when flying would have been much cheaper
- Very expensive trip to drive that far when CPA business can easily be down over the phone, by computer e-mail, or by using FedEx or some other kind of mail carrier
- He had to go that far for a CPA because he had been with her for a long time and she gave him a good deal when there are plenty of CPA's in Tucson
- Marshall said he owned properties in several states, but his Arizona and Colorado addresses were apartments
- Marshall lived in an Apartment in Tucson, but said he had problems with his irrigation system
- Offered to let me search his truck several times
- Would often say "Pardon me" when I asked him a question and then answer it without me asking the question again (Stalling while he thinks of the answer)
- Would try and change the conversation topic (About his travel) several times
- Told me several times that he is 78 years old (Seeking sympathy)
- Lengthy drug trafficking history
- Very nervous
- Very apologetic about minor traffic violation
- Lied (Downgraded) about what he had been arrested for

At this point in the traffic stop, I was suspicious that criminal activity may be afoot.

I issued Marshall Geary County traffic citation number 46332 (GESO Case # 13-02169) for speeding (See attached). I deactivated all of my forward facing emergency equipment, I gave him his copy of the citation along with all of the documents he had provided me. This occurred 22 minutes and 30 seconds into the stop. I note the times reported in this case were gathered from watching the traffic stop video in Windows Media Player. See below for further information on the traffic stop recordings and how they were taken. I explained to Marshall that I turned off all of my forward facing lights and that the traffic stop detention was over. I told Marshall if he wanted to stay and chat with me further then that was ok with me. Marshall said he wanted to chat for about ½ a minute. Marshall spoke with me about a few things that were not related to the traffic stop. I then said "Let me ask you this." Marshall replied "You want to look in my truck?" I replied "Can I?" Marshall replied "Sure, I am telling you I am clean, I've been out of the business that was 23 years ago." I replied "I would love to look in your truck if you will let me." Marshall replied "Yeah, I am giving you permission." Marshall goes on to explain that I am a decent guy and he would normally "bust my balls like I was busting his." Marshall and I then had some small talk about prior service. Marshall then says "Yeah you can look in the truck." We both exit my patrol car and walk to the back of Marshall's truck. Marshall turns the topper windows handles (Allowing it to open out) and opens it. I observe a refrigerator and a bunch of other items. All these other items appeared to be random junk type items. I ask Marshall if I can lower the tailgate and he said I could. I asked Marshall where all the stuff in his truck was coming from and he said Boston. I found this